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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Hunter Killer Productions, Inc. et al,)	Case No.: 1:19-cv-00168-LEK-KJM
)	(Copyright)
Plaintiffs,)	
vs.)	RULE 55(a) REQUEST FOR CLERK
)	TO ENTER DEFAULT AGAINST
Qazi Muhammad Zarlish, et al.)	DEFENDANTS QAZI
)	MUHAMMAD ZARLISH AND
Defendants.)	NGHI PHAN NHAT;
)	DECLARATION OF COUNSEL;
)	PROPOSED ENTRIES OF
)	DEFAULT; CERTIFICATE OF
)	SERVICE
)	

REQUEST FOR CLERK TO ENTER DEFAULT AGAINST DEFENDANTS
QAZI MUHAMMAD ZARLISH AND NGHI PHAN NHAT

TO: CLERK OF THE ABOVE-ENTITLED COURT:

Pursuant to Fed R. Civ. P. 55(a), Plaintiffs Hunter Killer Productions, Inc., TBV Productions, LLC, Venice PI, LLC, Bodyguard Productions, Inc. and LHF Productions, Inc., ("Plaintiffs") hereby apply for entry of default by the Clerk of the

Court against Defendants QAZI MUHAMMAD ZARLISH and NGHİ PHAN NHAT.

Defendant QAZI MUHAMMAD ZARLISH executed a Waiver of Service acknowledging receipt of the Summons and Complaint in Pakistan and that his responsive pleading was due 90 days from April 4, 2019. [Doc. #12]. Accordingly, Defendant QAZI MUHAMMAD ZARLISH's responsive pleading was due on July 3, 2019. Defendant QAZI MUHAMMAD ZARLISH has failed to appear or otherwise defend.

Pursuant to the Order Granting Plaintiffs' Second *Ex Parte* Motion for Order Permitting Clerk to perform foreign mailing [Doc. #17], Defendant NGHİ PHAN NHAT was served by delivering a copy of the Summons, Scheduling Order, Complaint and a Vietnamese Machine Translation thereof by FedEx on June 5, 2019. *See* Decl. of Stephanie Kessner [Doc. #20] at ¶3. Accordingly, Defendant NGHİ PHAN NHAT's responsive pleading was due on June 26, 2019. Defendant NGHİ PHAN NHAT has failed to appear or otherwise defend.

For these reasons, Plaintiffs request that the Clerk of the Court enter default judgment on all claims plead in the Complaint with regards to Defendants QAZI MUHAMMAD ZARLISH and NGHİ PHAN NHAT. Plaintiffs will separately file a request under Rule 55(b) for the court to (1) effectuate judgment; (2) determine the amount of damages; (3) establish the truth of any allegation by evidence; or (4)

investigate any other matter.

DATED: Kailua-Kona, Hawaii, July 8, 2019.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiffs